

EXHIBIT A

DAWN MEYER
SATANIC TEMPLE vs BELLE PLAINE

February 08, 2021

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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

THE SATANIC TEMPLE,

Case No. 19-CV-01122
(WMW/LIB)

Plaintiff,

v.

CITY OF BELLE PLAINE,

Defendant.

Deposition of

CITY OF BELLE PLAINE, MINNESOTA

through

DAWN MEYER

Monday, February 8, 2021

9:57 a.m.

KATHRYN M. MOHAWK, RPR
ESQUIRE DEPOSITION SOLUTIONS

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1
2 DAWN MEYER,
3 called as a witness, after having been duly sworn,
4 was examined and testified as follows:

5 EXAMINATION

6 BY MR. KEZHAYA:

7 Q. Please state your name for the record.

8 A. Dawn Meyer.

9 Q. And, Dawn, what is your role with the City?

10 A. Administrator.

11 Q. And what does an administrator do for the City?

12 A. In general terms, they manage the office and follow
13 policy as set by city council.

14 Q. Okay. Do you serve as the chief executive for the
15 City?

16 A. City government doesn't set chief executives, but I
17 -- There is no other position staff-wise above my
18 position.

19 Q. Okay. Do you report directly to the council?

20 A. I do.

21 Q. Okay. Are they -- For all intents and purposes,
22 are they your bosses?

23 A. Yes.

24 Q. Okay. Is yours an elected position?

25 A. No.

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1 like your predecessor that the monument was ready
2 to be installed. Were you aware of this?

3 A. Yes.

4 Q. Okay. And you actually responded to Malcolm saying
5 that it couldn't be arranged for until July 6; is
6 that right?

7 A. Correct.

8 Q. What was your -- What was your role at this time?

9 A. I was serving as an acting administrator in the
10 absence of the administrator.

11 Q. Okay. And so you sent an email to Chris Meyer
12 shortly after responding to Malcolm; is that right?
13 This would be the email in question.

14 (Referencing Exhibit No. 7.)

15 A. Yep. I'm just refreshing my memory. Yes.

16 Q. Okay. And Mayor Meyer responded the next morning
17 asking you to set up a workshop session with the
18 council and the veterans for July 10th, right?

19 A. Correct.

20 Q. Okay. Did you, in fact, set up that workshop
21 session?

22 A. There was no council workshop scheduled on July
23 10th.

24 Q. Okay. So you responded that you'll work on getting
25 it set up and posted. We see this on Exhibit 7,

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1 right?

2 MR. MILLS: Objection: This is beyond the
3 scope.

4 MR. KEZHAYA: This is meetings, Monte.
5 I've heard your objection. Please answer the
6 question.

7 MR. MILLS: This is beyond -- Meetings
8 constituting the internal decision making about
9 plaintiff's request.

10 MR. KEZHAYA: Yes. This would fall very
11 cleanly under that. Dawn, please answer the
12 question.

13 MR. MILLS: I'll allow this one to proceed
14 with that clarification.

15 A. I'm sorry. Can you repeat the question?

16 Q. Did you, in fact, set up a workshop session?

17 A. We did not have a public meeting or the workshop
18 session.

19 Q. Okay. What is a workshop session?

20 A. It's a public meeting with the council as a whole
21 to review City business.

22 Q. Okay. You said you didn't have a public meeting.
23 Was there a private meeting?

24 A. No.

25 Q. Okay. Was any number of city council members

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1 meeting on July 10th?

2 A. Not to my knowledge.

3 Q. Okay. After this -- Well, what was the nature of
4 telling Malcolm that this installation process
5 would have to wait until July 6th?

6 A. If you refer to the email --

7 Q. Uh-huh.

8 A. -- the installation was coordinated through our
9 public work superintendent who manages all City
10 property, and he was out of the office until that
11 date.

12 Q. Okay. Was that the only reason?

13 A. Yes.

14 Q. Okay. Between, looks like, June 30 and about July
15 13, Mr. Fahey was coordinating with Malcolm on
16 installing the monument; is that right?

17 A. Al Fahey was out of the office when I responded to
18 that.

19 Q. Uh-huh.

20 A. So he would have been coordinating when he
21 returned.

22 Q. Correct. So between -- call it July 6 and July 13,
23 he was coordinating with Malcolm to find a date to
24 install the monument. Right?

25 MR. MILLS: So I'll object. The scope of

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2 STATE OF MINNESOTA)3 COUNTY OF ANOKA)
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5 I, Kathryn M. Mohawk, the undersigned, a duly
6 commissioned and qualified notary public within and for
7 the County and State aforesaid, do hereby certify that
8 before the giving of her deposition, DAWN MEYER was by
9 me first duly sworn upon her oath to depose the whole
10 truth and nothing but the truth; that the foregoing is
11 a true and correct copy of my original stenotype notes
12 taken at said deposition; that I am neither a relative
13 of nor attorney for any of the parties to the cause and
14 have no interest whatsoever in the result of the same;
15 that the cost of the original has been charged to the
16 party who noticed the deposition, and that all parties
17 who ordered copies have been charged at the same rate
18 for such copies.

19 WITNESS MY HAND AND SEAL this 11th day of
20 February, 2021.

21 
22 _____
23 KATHRYN M. MOHAWK
24
25

Administrator

From: Dawn Meyer
Sent: Friday, June 30, 2017 12:28 PM
To: C.G. Meyer
Subject: Re: FW: Veterans Memorial Display Permit

Thank you Chris,
I will work on getting it set up and posted.

Enjoy your vacation.

Sent via the Samsung Galaxy S7, an AT&T 4G LTE smartphone

----- Original message -----

From: "C.G. Meyer" <cgmcompanies@gmail.com>
Date: 6/30/17 11:48 AM (GMT-06:00)
To: Dawn Meyer <dmeyer@ci.belleplaine.mn.us>
Subject: Re: FW: Veterans Memorial Display Permit

Dawn,

As you know I will be out next week on vacation. I will be checking my business email as well as texts and will also be available by phone.

Please try and set up a Workshop session with the Council and the Veterans for Monday July 10 if possible. We can discuss the whole public forum issue again and at the very minimum have their organizations going on public record that they are in favor or not of having the pending memorial erected. I think this will be the best way to move this forward. If it is in the workshop setting there maybe some outside people attending but I will limit the discussion to just the Council and the Veterans and not an open mic night.

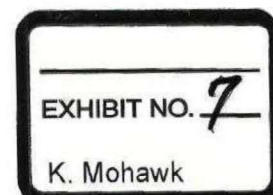
Thanks,

Chris

Christopher G. Meyer - President/CEO
Capital Growth Management, Inc.

On Thu, Jun 29, 2017 at 2:36 PM, Dawn Meyer <dmeyer@ci.belleplaine.mn.us> wrote:

Mayor and Council-



I am forwarding you an email that was received. I have responded to Mr. Jarry that installation will need to be coordinated through Public Works Superintendent Fahey when he returns from vacation on Thursday July 6th.

I will also make sure that the installation is coordinated through Chief Stolee.

Please let me know if you have any questions.

Thank you

Dawn

From: Malcolm Jarry [mailto:satanictempleorg@gmail.com]
Sent: Thursday, June 29, 2017 1:34 PM
To: Michael Votca <mvotca@ci.belleplaine.mn.us>
Cc: Al Fahey <publicworks@ci.belleplaine.mn.us>
Subject: Re: Veterans Memorial Display Permit

Dear City Administrator Votca:

We have completed work on our statue and would like to work with you to coordinate a date for installation. Please note that my organization believes that veterans fought to protect and preserve the liberties enshrined in the US Constitution and our participation in the limited forum is conceived to be an affirmation of these values. It is not our intent to take attention away from the sacrifices of veterans.

The City Council has displayed nothing but professional courtesy to us and it is our policy to do likewise by working with the City to make sure things go smoothly and as quietly as possible. We all want to honor veterans and none of us want differences of opinions regarding our statue's presence to divide a city. The good people of Belle Plaine can respectfully agree to disagree with regards to our presence and those who oppose its placement are probably best served by avoiding controversy beyond expressing their dissent.

Kindly let me know your thoughts on how we can best install the statue with a simple ceremony where order is maintained and attendees respect the solemnity of the event. We would like to work with the Council at every step.